

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

BITMAIN TECHNOLOGIES GEORGIA
LIMITED,

Plaintiff,

V.

Case No.: 4:24-cv-00927

JWKJ TECHNOLOGIES LLC,

Defendant.

**PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER,
PRELIMINARY INJUNCTION, AND EXPEDITED DISCOVERY**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Bitmain Technologies Limited (“Bitmain” or “Plaintiff”) respectfully requests that this Court enter a temporary restraining order and temporary injunction enjoining Defendant JWKJ Technologies LLC (“JWKJ”) from:

(i) preventing Bitmain from entering JWKJ’s facility located at 4350 Semple Avenue, St. Louis, MO 63210 (the “Data Center Facility”) for the purpose of removing 3,407 of Bitmain’s bitcoin mining servers (the “Hosted Servers”);

(ii) selling or otherwise disposing of the Hosted Servers;

(iii) continuing to use the Hosted Servers to mine bitcoin while the computational power for the Hosted Servers is directed to a mining pool with rewards for JWKJ or any affiliated entity; and

(iv) selling or otherwise disposing of any bitcoin JWKJ mined while the computational power for the Hosted Servers was directed to a mining pool with rewards for JWKJ or any affiliated entity.

In connection with the temporary restraining order, Bitmain requests the Court to allow expedited discovery so Bitmain can prepare for any preliminary injunction hearing.

In support of this Motion, Bitmain adopts by reference the statements in and exhibits set forth in the Complaint, Declaration of Zheng Shang (including exhibits thereto), and Memorandum in Support being filed contemporaneously.

DATED: July 8, 2024

Respectfully submitted,

SHANK & HEINEMANN, LLC

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Certificate of Service

I hereby certify that a true copy of the foregoing Plaintiff's Motion for Temporary Restraining Order, Preliminary Injunction, and Expedited Discovery is being served by electronic mail on July 8, 2024 on the following counsel for Defendant JWKJ Technologies LLC:

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*/s/ Christopher S. Shank*_____

Attorney for Plaintiff